

Apr 21, 2022

ANGELA E. NOBLE
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S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
22-20165-CR-GAYLES/TORRES
CASE NO. _____

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(d)(1)

UNITED STATES OF AMERICA

vs.

CHARLES LIVINGSTON ANDERSON II,

Defendant.

INDICTMENT

The Grand Jury charges that:

On or about November 1, 2021, in Miami-Dade County, in the Southern District of Florida,
the defendant,

CHARLES LIVINGSTON ANDERSON II,

in connection with the acquisition of firearms from a federally licensed firearms dealer, that is, Miami Police Depot Inc., did knowingly make a false and fictitious statement, which was intended and likely to deceive the dealer with respect to any fact material to the lawfulness of the acquisition of said firearms, in that the defendant Charles Livingston Anderson II, stated in Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that he was the actual buyer of the firearms, when in truth and in fact, and as the defendant then and there well knew, he was purchasing the firearms for another person, in violation of Title 18, United States Code, Section 922(a)(6).

It is further alleged that the firearms were:

- A. One (1) Taurus G2C, 9mm, serial number ACH191764;
- B. One (1) Taurus G2C, 9mm, serial number ACH191970;
- C. One (1) Taurus G2C, 9mm, serial number ACH192116;
- D. One (1) Taurus G2C, 9mm, serial number ACH191761;

- E. One (1) Taurus G2C, 9mm, serial number ACH151730;
- F. One (1) Taurus G2C, 9mm, serial number ACH152487;
- G. One (1) Taurus G2C, 9mm, serial number ACH191965;
- H. One (1) Taurus G2C, 9mm, serial number ACH196486;
- I. One (1) Taurus G2C, 9mm, serial number ACH196432;
- J. One (1) Taurus G2C, 9mm, serial number ACH196652;
- K. One (1) Taurus G2C, 9mm, serial number ACH196473;
- L. One (1) Taurus G2C, 9mm, serial number ACH196681; and
- M. One (1) Taurus G2C, 9mm, serial number ACH196431.

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, **CHARLES LIVINGSTON ANDERSON II**, has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 922, or any other criminal law of the United States, as alleged in this Indictment, the defendant shall forfeit to the United States any firearm involved in or used in the commission of such offense, pursuant to Title 18, United States Code, Section 924(d)(1).


It is further alleged that the firearms were:

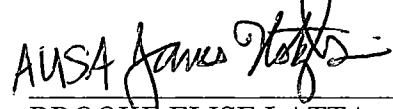
- A. One (1) Taurus G2C, 9mm, serial number ACH191764;
- B. One (1) Taurus G2C, 9mm, serial number ACH191970;
- C. One (1) Taurus G2C, 9mm, serial number ACH192116;
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- J. One (1) Taurus G2C, 9mm, serial number ACH196652;
- K. One (1) Taurus G2C, 9mm, serial number ACH196473;
- L. One (1) Taurus G2C, 9mm, serial number ACH196681; and
- M. One (1) Taurus G2C, 9mm, serial number ACH196431.

All pursuant to Title 18, United States Code, Section 924(d)(1), and the procedures set forth at Title 21, United States Code, Section 853, as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

~~FOREPERSON~~


JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


BROOKE ELISE LATTA
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO.:

v.

CERTIFICATE OF TRIAL ATTORNEY*

CHARLES LIVINGSTON ANDERSON II,
_____/

Superseding Case Information:

Court Division (select one)


- ☒ Miami ☐ Key West ☐ FTP
☐ FTL ☐ WPB

New Defendant(s) (Yes or No)
Number of New Defendants
Total number of New Counts

I do hereby certify that:

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect:
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:
(Check only one) (Check only one)
I ☒ 0 to 5 days ☐ Petty
II ☐ 6 to 10 days ☐ Minor
III ☐ 11 to 20 days ☐ Misdemeanor
IV ☐ 21 to 60 days ☒ Felony
V ☐ 61 days and over
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge Case No.
7. Has a complaint been filed in this matter? (Yes or No) Yes
If yes, Magistrate Case No. 22-MJ-02425-JG
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge Case No.
9. Defendant(s) in federal custody as of 4/1/2022
10. Defendant(s) in state custody as of
11. Rule 20 from the District of
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Maynard? (Yes or No) No
14. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss? (Yes or No) No

By:



BROOKE ELISE LATTA
Assistant United States Attorney
FLA Bar No. 105315

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: CHARLES LIVINGSTON ANDERSON II

Count #: 1

False Statement During a Firearms Purchase

Title 18, United States Code, Section 922(a)(6)

***Min./Max. Penalty:** 10 Years' Imprisonment; \$250,000 Fine; 3 Years' Supervised Release

***Refers only to possible term of incarceration, does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**